



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Copy of mine comments alone

Mr. Hugh Stirts, CENWO-PM-HA
US Army Corps of Engineers
Omaha District
Two Central Park Plaza, 9th Floor
Omaha, NE 68102



Re: Specific Comments to the Draft Supplemental Ground Water Investigation Addendum V
Field Sampling Plan Himco Dump, Superfund Site

Mr. Stirts:

Please find below my comments to the above reference draft document.

3.2.2.1 Ground water sampling, introduction, page 5.

Contractor shall add the following monitoring wells to the ground water sampling event:

USGS wells: B1, B3, & B4, C1, E1 & E3, G1 & G3, J1 & J2, I1 & I3, WTO1, Q1,

US EPA wells: WT101B, WT101C, WT102B, WT102C, WT113A, WT113B,

Contractor shall delete the following background well from sampling event : WT112A

Contractor shall add the following background well to sampling event: WT113A and WT113B
see page 5, and 6.

Total summary of all monitoring wells to sample, n=40:
residential n= 7 and the following:

USGS deeper aquifer wells: B1, B3, & B4, C1, E1 & E3, G1 & G3, J1 & J2, I1 & I3, WTO1,
Q1;

Background wells: WT102A, WT102B, WT102C, WT113A, WT113B

down gradient wells: WT101A, WT101B, WT101C, WT101A, WT105A, WT106A, WT111A,
WT114B, WT115A, WT116B, WT117A, WT117B, WT118A,
WT1119A

Figure 2

Contractor shall remove the plat map which shows the exact parcel location of the residential well sampling, leave the RWXX in place, but remove plat boundaries and street names.

Contractor shall add Sulfate and Bromide to the sampling analysis on page 7, see: Ground water samples obtained from all wells will be analyzed for: VOCs, SVOCs, TAL metals, Sulfate and Bromide.

3.2.2.2 Equipment and Procedures- Monitoring Wells

Contractor shall adjust the first paragraph with the heading monitoring wells on page 6 to include the monitoring wells added during this comment letter.

4.2 Sample Labels

Contractor shall add Sulfate and bromide to the list of analysis required. (Sample for VOC, SVOC, TAL metals, Sulfate and Bromide)

7.3 Background Comparison

Contractor shall delete well number WT112, and replace the deletion with well number WT113A and WT113B.

Table 1, Sample Collection Summary

Contractor shall add Sulfate and Bromide to both the Monitoring Wells and the Residential wells, under the column entitled "Parameters" see Table 1.

Table 2, Sample Containers, Preservatives, and Holding Times

Contractor shall add Sulfate and Bromide to the column entitled "Parameters" see Table 2, and make the necessary adjustments to the "container, preservation and maximum holding times.

Appendix A

Monitoring Well Construction Diagrams

Contractor shall add the monitoring well construction diagrams to include the wells added during comments to this draft document. See 3.2.2.1 Ground water sampling, introduction from above.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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CHICAGO, ILLINOIS 60604

March 27, 2000

Mr. Hugh Stirts, CENWO-PM-HA
US Army Corps of Engineers
Omaha District
Two Central Park Plaza, 9th Floor
Omaha, NE 68102

Re: Specific Comments to the Draft Supplemental Ground Water Investigation Addendum V
Field Sampling Plan Himco Dump, Superfund Site

Mr. Stirts:

Please find below comments to the Draft Supplemental Ground Water Investigation Addendum V Field Sampling Plan Himco Dump, Superfund Site, February 2000.

- 1) Page 2, under the **Lead Field Geologist/Site Safety and Occupational Health Officer** section. The US Army Corps of Engineers (USACE) designates these two job functions as the same person. Unfortunately, this is generally recommended not to be the same person by the USEPA, since one job role is to ensure the work is completed in a timely manner, and the second job role is to ensure the work is completed safely. This may sometimes be a conflicting role, and having the same person make both decisions sometimes results in compromising safety.
- 2) Page 3, first paragraph lists the monitoring wells to be measured for water levels. Add the following wells to this round of water level measurements: WTB1, WTB3, WTB4, WTE3, WTG1, WTG3, WT101C, WT102C.
- 3) Page 3/4, under the **3.2.1 Water Level Measurements** section. All measurements should be taken relative to reference points at the top of the wells to ensure consistent water-level elevations.
- 4) Page 5, under the **3.2.1.3 Equipment Decontamination** section. The plan does not provide information on how the inside of the sampling pumps will be decontaminated. It does reference a section 3.3, which does not exist.
- 5) Page 5, under the **3.2.2.1 Introduction to the Ground Water Sampling** section. This section specifies which monitoring wells are to be sampled (as does the first paragraph of section 3.2.2.2). However, no justification is provided as to why which wells were to be sampled, and for what parameters. In addition, no justification is provided as to why

which of the parameters is to be selected for analysis. Justification as to why these wells are to be sampled is as follows:

Monitoring wells WT102A, WT102B, W102C, WT113A, WT113B, WTB1, WTB3, WTB4 are to be sampled to determine the present background water-quality data. **Note: background monitoring well WT112A & B has been replaced with WT113A & WT113B during this comment letter.** Previous ground-water sampling rounds did not always include all downgradient monitoring wells and analyze for all previously detected analytes and compounds. Therefore, the following downgradient monitoring wells are to be sampled: WT01, WTE1, WTE3, WTG1, WTG3, WT101A, WT101B, WT101C, WT105A, WT106A, WT111A, WT114A, WT114B, WT115A, WT116A, WT116B, WT117A, WT118B and WT119A. These wells will be analyzed for Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), total Target Analyte List (TAL) Metals, Bromide and Sulfate. The VOCs, SVOCs and TAL metals have been detected in several of the monitoring wells within this well network above background concentrations. Bromide has been detected in the past by the U.S. Geological Survey (USGS), and will be used to compare to previous results to determine the attenuation of contaminants from the landfill. Sulfate is to be analyzed, since this was one major component of waste material deposited in the landfill (deposited as Calcium Sulfate). Also include the following residential wells to be sampled which were not identified in the draft work plan: *Lot NO. 12, Lot NO 13, and Lot NO 41, not Lot No. 40.* These wells will be analyzed for Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), total Target Analyte List (TAL) Metals, Bromide and Sulfate.

- 6) Page 6, first paragraph under the **3.2.2.2 Equipment and Procedures -Monitoring Wells** section. Add the monitoring wells as described in comment #4 above. **Note:** background monitoring well WT112A has been replaced with WT113A & WT113B during this comment letter
- 7) Page 6, third complete paragraph. Total well depth measurements should be completed sufficiently prior to the commencement of pumping, to allow any turbidity stirred up to settle. In addition, is the weight at the end of an electric tape sufficient to get an accurate total depth measurement? Generally, for deeper wells especially, a heavier weight is needed. Give a time an approximate time frame to allow turbidity to settle, also define the weight amount to be used if the well is shallow versus a deep well.
- 8) Page 6, last paragraph first. Describe how the pump intake will be set? Will the pump be lowered to the bottom, and then raised to the appropriate depth? If so, sufficient time should be allowed for the turbidity to settle.
- 9) Also on Page 6, last paragraph. It is stated the purge parameters (temperature, pH, specific conductance, Eh, dissolved oxygen and turbidity) will be measured "at a minimum of once per casing volume...". This is not consistent with the low-flow sampling technique that the USACE stated will be used. Clarify if the measurements will

be taken at a minimum of once per tubing volume, or at a time frequency of once per 10 or 15 minutes of pumping (which again, is usually dependent on tubing volume). Since the whole basis of the low-flow sampling technique is based on not pulling stagnant water from above the well screen, the use of casing volumes as a part of the calculation is counter-productive. In addition, the purge criteria should be stabilization to: ± 0.1 for pH, $\pm 3\%$ for specific conductance, ± 10 mV for Oxidation Reduction Potential, $\pm 10\%$ for turbidity. These stabilization criteria and purge method are consistent with the Puls and Barcelona, 1996 paper. Temperature is generally too hard for stabilization, since it is biased by sunlight, etc., and/or stabilization is reached much too quickly to represent water-quality changes.

- 10) Page 7, first incomplete paragraph. In the workplan it is written that wells are to be purged dry. This should not be done under the circumstances described (low yielding wells), as some research has shown this can significantly impact water quality (McAlary and Barker, 1987). Obviously, for low yielding wells under water-table conditions, this may not be avoidable (especially if only a few feet of water is present in the well). However, for discretely-screened wells below the water table, the pump intake should be placed above the screened interval, and the water pumped only this level and then allowed to recover. This avoids dewatering of the screened interval.
- 11) Page 7, last paragraph. This references paragraph 3.3, which should be a section, not a paragraph, and neither this referenced paragraph or section exists.
- 12) Page 8, under the **3.2.2.3 Equipment and Procedures - Residential Wells** section fourth paragraph. The USACE should also ask the residents on the water-use for the day, and document any comments by the resident such as water quality, i.e. smell, color, taste, etc.
- 13) Page 11, under the **4.2 Sample Labels** section add Sulfate and Bromide to the list of analysis required.
- 14) Page 15, under the **7.3 Background Comparison** section, remove well number WT112 and replaced with WT113A and WT113B which were recommended during this memo.
- 15) **Table 1, Sample Collection Summary** section will need to have the number of samples updated to include the comments provided in this memo. This table does not reflect samples collected for bromide or sulfate added during this comment. In addition, the MS/MSD volume under footnote #1 is generally 3 times the volume for organics and 2 times the volume for metals. Under footnote #2, the equipment blank is generally after the most suspected "contaminated" well area, as it relates to the groundwater flow migrating from the Landfill, to measure the worse-case scenerio. For the residential this would be Lot NO. 12 for the monitoring well this would be MW119A.
- 16) **Table 2, Sample Containers, Preservatives Holding Times** needs to be updated to include Bromide and Sulfate added during this comment.

- 17) Submit all chemical analysis, water level measurements, well construction logs and any geo-technical information in the U. S. EPA's Electronic Data Deliverable (EDD) format, which consist of a series of ASCII table. Any database or spreadsheet can export into ASCII. Submit an electronic version of the site map in a CAD "DXF" format.
- 18) **Appendix A, Monitoring Well Construction Diagrams** add the monitoring well construction diagrams to include the wells added during comments to this draft document.

References:

McAlary, T. A. and J. F. Barker, 1987, Volatilization Losses of Organics During Ground Water Sampling from Low Permeability Materials, Ground Water Monitoring Review, Vol. 7, No. 4, pp. 63-68.

Puls, R.W. and M J. Barcelona, 1996, Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures, U.S. Environmental Protection Agency Ground Water Issue, EPA/540/S-95/504, 12 pp.

attachment: draft description of the required U.S. EPA Electronic Data Deliverable (EDD) format.

12/12/00
ghm

Contingent Plan - Pat

Himco Ground Water

Here are some thoughts for further discussion on the Himco GW requirements to determine compliance/triggers for further action.

The idea would be no change in stability of the ground water plumes. The ground water recommendations are reasonably consistent with the State of Indiana (IDEM) requirements. We also want no continuing off-site volatiles migration.

Does EPA have any more-stringent requirements?

Requirements:

Initial:

- * Installation of a municipal drinking water source for off-site residents adjacent to site
- * Installation of a temporary cap on-site (nature to be determined)
- * Installation of a soil vapor intercept system
- * Institutional controls on-site.
- * No changes in land use without re-evaluation.
- * No change in site ground water characterization (consistent with IDEM)
 - establish Industrial Perimeter of Compliance (boundary) and compliance levels
 - lower of solubility or pathway level (IDEM uses 10^{-5} risk level for Ind)
 - establish off-site (residential levels) for Residential Perimeter of Compliance at the fence line (usual IDEM boundary)
 - MCL or pathway level, whichever is applicable (IDEM uses 10^{-5} level)
 - recovery of any free product
 - demonstrate plume stability for GW contaminants
 - no further degradation of landfill
 - no further migration of contaminants
 - establish sentinel well system (off-site/residential locations)
- * Develop a series of permanent monitoring wells, screened at appropriate (3) depths, to monitor on-site (site-boundary) and off-site levels
 - Unlikely that can install on-site source "messenger" wells within Ind POC
 - Determine number and location of on-site residential (POC) wells (3-5?)
 - Determine number and location of off-site sentinel wells (number?)
 - Install Background wells
- * Develop soil gas monitoring approach to evaluate effectiveness of onsite gas collection system

Monitoring:

- * All wells monitored for 8 consecutive quarters (2 years) to determine initial stability
- * Evaluate trend data for each contaminant in each well
 - only 1 messenger well (if installed) may show a negative trend
 - no on-site POC wells may show a negative trend (no increase in release of any contaminant)
 - no off-site sentinel wells may show a negative trend
- * If initial monitoring shows stability (no trend), continue quarterly monitoring for 5 more years
- * If any well fails trend test, immediately install impermeable cap

Questions:

- * Is this area considered to be a Wellhead Protection Area by Indiana statute? If so, requirements may be more stringent.

Construction Debris Area (CDA)

Soil Sampling (ideal)

- * IDEM: 3 borings per 1/10 acre source area
5 borings per 1/4 acre source area
10 borings per 1/2 acre source area
- * For judgmental sampling, no statistical calculation; use maximum values
- * Remove soil in any Parcel if any contaminant exceeds pathway level or cumulative level exceeds risk level

Ground Water Sampling

- * Installation of off-site monitoring well as part of ongoing site ground water monitoring; requirements same as for other off-site areas.



Toxlady@aol.com on 12/11/2000 11:39:49 AM

To: Gwendolyn Massenburg
Subject: Some Ideas for HIMCO

Hi Gwen

Here are my thoughts on points we need to decide upon re the strategy for long-term monitoring at Himco.....if they are still resisting a cap.

These are just ideas for discussion between you, Larry, Doug and I. After we agree on what EPA's needs are, we could go to IDEM to see if they concur.

I also have some further diagrams and outlines from the RISC training course, which would illustrate the RISC strategy. Doug need to tell us if it is sufficient for EPA.

Talk to you tomorrow.

Pat



GrndwtrE.wpd

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

Date: March 22, 2000

Subject: Review of the Supplemental Ground Water Investigation Addendum Field Sampling Plan for the Himco Landfill site in Elkhart, IN

From: Doug Yeskis, Geologist *Doug Yeskis*
Remedial Response Section #2

To: Gwen Massenburg, RPM
Remedial Response Section #4

The following are my comments on the review of the Supplemental Ground Water Investigation Addendum Field Sampling Plan for the Himco Landfill site in Elkhart, IN dated February 15, 2000. These comments are:

- 1) Page 2, under the Lead Field Geologist/Site Safety and Occupational Health Officer section. The US Army Corps of Engineers (USACE) designates these two job functions as the same person. Unfortunately, this is generally recommended not to be the same person by the USEPA, since one job role is to ensure the work is completed in a timely manner, and the second job role is to ensure the work is completed safely. This may sometimes be a conflicting role, and having the same person make both decisions sometimes results in compromising safety.
- 2) Page 3, first paragraph lists the monitoring wells to be measured for water levels. I would suggest the following wells to be added to this round of water level measurements: WTB1, WTB3, WTB4, WTE3, WTG1, WTG3, WT101C, WT102C.
- 3) Page 3/4, Section 3.2.1 Water Level Measurements. All measurements should be taken relative to reference points at the top of the wells to ensure consistent water-level elevations.
- 4) Page 5, Section 3.2.1.3 Equipment Decontamination. The plan does not provide information on how the inside of the sampling pumps will be decontaminated. It does reference a section 3.3, which does not exist.
- 5) Page 5, Section 3.2.2.1 Introduction to the Ground Water Sampling Section. This section specifies which monitoring wells are to be sampled (as does the first paragraph of section 3.2.2.2). However, no justification is provided as to why which wells were to be sampled, and for what parameters. In addition, no justification is provided as to why which of the parameters is to be selected for analysis. I have provided the following language for your consideration:
Monitoring wells WT102A, WT102B, W102C, WT113A, WT113B, WTB3, WTB4 are to be sampled to determine the present background water-quality data. Previous ground-water sampling rounds did not always include all downgradient

monitoring wells and analyze for all previously detected analytes and compounds. Therefore, the following downgradient monitoring wells are to be sampled: WT01, WTE1, WTE3, WTG1, WTG3, WT101A, WT101B, WT101C, ~~WT104A~~, WT105A, WT106A, WT111A, WT114A, WT114B, WT115A, WT116A, WT116B, WT117A, WT118B and WT119A. These wells will be analyzed for Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), total Target Analyte List (TAL) Metals, Bromide and Sulfate. The VOCs, SVOCs and TAL metals have been detected in several of the monitoring wells within this well network above background concentrations. Bromide has been detected in the past by the U.S. Geological Survey (USGS), and will be used to compare to previous results to determine the attenuation of contaminants from the landfill. Sulfate is to be analyzed, since this was one major component of waste material deposited in the landfill (deposited as Calcium Sulfate).

- 6) Page 6, first paragraph under section 3.2.2.2. Add the monitoring wells as described in comment #4 above.
- 7) Page 6, third complete paragraph. Total well depth measurements should be completed sufficiently prior to the commencement of pumping, to allow any turbidity stirred up to settle. In addition, is the weight at the end of an electric tape sufficient to get an accurate total depth measurement? Generally, for deeper wells especially, a heavier weight is needed.
- 8) Page 6, last paragraph. How will the pump intake be set? Will the pump be lowered to the bottom, and then raised to the appropriate depth? If so, sufficient time should be allowed for the turbidity to settle. *how much time is this approximately?*
- 9) Page 6, last paragraph. The USACE states the purge parameters (temperature, pH, specific conductance, Eh, dissolved oxygen and turbidity) will be measured "at a minimum of once per casing volume...". This is not consistent with the low-flow sampling technique that the USACE states will be used. Either, they mean that measurements will be taken at a minimum of once per tubing volume, or at a time frequency of once per 10 or 15 minutes of pumping (which again, is usually dependent on tubing volume). Since the whole basis of the low-flow sampling technique is based on not pulling stagnant water from above the well screen, the use of casing volumes as a part of the calculation is counter-productive. In addition, the purge criteria should be stabilization to: ± 0.1 for pH, $\pm 3\%$ for specific conductance, ± 10 mV for Oxidation Reduction Potential, $\pm 10\%$ for turbidity. These stabilization criteria and purge method are consistent with the Puls and Barcelona, 1996 paper. Temperature is generally too hard for stabilization, since it is biased by sunlight, etc., and/or stabilization is reached much too quickly to represent water-quality changes.
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the screened interval, and the water pumped only this level and then allowed to recover. This avoids dewatering of the screened interval.

- 11) Page 7, last paragraph. This references paragraph 3.3, which should be a section, not a paragraph, and neither this referenced paragraph or section exists.
- 12) Page 8, fourth paragraph. The USACE should also ask the residents on the water-use for the day, and any comments on water quality by the resident.
- 13) Page 15, second paragraph in section 7.3 should include the added background locations recommended in this memo.
- 14) Table 1 will need to have the number of samples to be revised based on the comments provided in this memo. This table does not reflect samples collected for bromide or sulfate. In addition, the MS/MSD volume under footnote #1 is generally 3 times the volume for organics and 2 times the volume for metals. Under footnote #2, the equipment blank is generally after the most "contaminated" well to measure the worse-case scenerio.
- 15) Table 2 does not include Bromide or Sulfate.

References:

McAlary, T.A. and J.F. Barker, 1987, Volatilization Losses of Organics During Ground Water Sampling from Low Permeability Materials, Ground Water Monitoring Review, Vol. 7, No. 4, pp. 63-68.

Puls, R.W. and M.J. Barcelona, 1996, Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures, U.S. Environmental Protection Agency Ground Water Issue, EPA/540/S-95/504, 12 pp.

I hope these comments have been of some assistance to you. If you have any questions on these comments, please feel free to call me at 6-0408.

cc: Bruce Sypniewski, SR-6J

June 21, 2005

To: Greg Polonica, Corporate Finance Unit

From: Mimi Chesslin, EES

HIMCO WASTE AWAY SERVICES, INC.

The HIMCO dump was an unlicensed landfill covering some 60 acres in Elkhart, Indiana, which was in operation between 1960 and 1976. The operator of the dump, which is now an NPL Site, was a corporation named Himco Waste Away Services, Inc. The principal in the corporation's early years was Charles Himes, Sr.; the current president is Charles Himes, Jr.

To resolve its liability at the Himco Dump Site, Himco Waste Away Services, Inc. recently offered a cash contribution of \$250,000 towards response costs, to be paid at the time of entry of a consent decree, which is imminent. Himco also offered to pay \$1,250,000 some four years from now, from the date of entry of the decree. (The implication is that the company will have insurance proceeds in four years, from which it can pay the balance). The company's offer is contained in an April 4, 2004 letter to Larry Johnson and Gwen Massenburg at EPA Region 5. A copy of the letter is in the Himco package which is being sent to you. The letter indicates that the offer was based on the company's historic financial condition and its purported inability to pay more. You will note that in the original April 4, 2004 letter the company offered whatever financial information might be necessary to demonstrate Himco's inability to pay more in response costs at the Site. Note also that the letter claims that the Himco landfill was run by a sole proprietorship. We have evidence that this is untrue; that Himco Waste Away Services, a corporation, was the operator.

EPA Region 5 sent Himco Waste Away Services a CERCLA Section 104(e) request for financial information on May 13, 2005. . A copy of this 104(e) request is also being sent to you. Note that in addition to routine corporate and business information, question 17 asks Himco to identify environmental insurance policy coverage information, together with copies of relevant policies. Question 18 asks for tax returns, records and other information in support of any assertion that Himco is financially not able to contribute (or has limited ability to contribute) to cleanup costs at the Himco Dump Site.

The last document submitted by Himco is a June 3, 2005 response to the CERCLA 104(e) response. **In your review, we are interested primarily in Himco's financial history and current situation. What can you determine about Himco's ability to pay? What can you tell us from this history that will enable us to ask Himco for more than it is currently offering? Is it plausible that it cannot afford more than \$250,000? What about \$1 million dollars or \$1,500,000 in installment payments?** We are also interested in its insurance history. Does it have coverage for past events (pre-1976?) at the landfill? Is there a time limit on applying for such coverage. Why is it able to delay applying for proceeds so funds are not available now but will be available in four years? **What questions can be asked to elicit the necessary information?**